

# **EXHIBIT 1**

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

PAIGE A. THOMPSON,

Defendant.

NO. CR19-159 RSL

**BILL OF PARTICULARS**

**[FILED UNDER SEAL]**

Pursuant to the Court's Order Denying Motion to Dismiss Counts 1, 9, and 10 (Docket No. 202) (the "Order"), the United States of America hereby provides the following Bill of Particulars:

**Data Downloaded from Victim Servers**

The data downloaded from each of the victims identified by number in the Second Superseding Indictment (each of which previously has been identified by name to the defense), is as follows:

- Victim 2 – the data downloaded from this victim is contained in the following folder on the defendant's computer:

(volume md126):/aws\_dumps/[REDACTED].tar.xz

An image of this folder was included on a hard drive produced to the defense on January 14, 2022. As indicated in discovery produced on

1       October 2, 2019, Victim 2 has described this data as publicly available  
2       information for which no special access was required. *See* USA-  
3       0000642. As a result, the Second Superseding Indictment does not  
4       include a charge relating to the theft of data from Victim 2.

- 5       ■ Victim 3 – the data downloaded from this victim is contained in the  
6       following folder on the defendant’s computer:

7       (volume md126):/aws\_dumps/[REDACTED].tar.xz

8       An image of this folder was included on a hard drive produced to the  
9       defense on January 14, 2022. As indicated in discovery produced on  
10      December 31, 2019, Victim 3 has described the data as configuration  
11      and source code from programming projects, specifically, packaged  
12      applications and configuration information used to deploy business  
13      applications. *See* USA-00001689.

- 14      ■ Victim 4 - the data downloaded from this victim is contained in the  
15      following folder on the defendant’s computer:

16      (volume md126):/aws\_dumps/[REDACTED].tar.xz

17      An image of this folder was included on a hard drive produced to the  
18      defense on January 14, 2022. As indicated in discovery produced on  
19      April 15, 2020, Victim 4 has described this information as  
20      communications data that had been publicly released. *See* USA-  
21      00005019. As a result, the Second Superseding Indictment does not  
22      include a charge relating to the theft of data from Victim 4.

- 23      ■ Victim 5 - the data downloaded from this victim is contained in the  
24      following folder on the defendant’s computer:

25      (volume md126):/aws\_dumps/[REDACTED].tar.xz

26      An image of this folder was included on a hard drive produced to the  
27      defense on January 14, 2022. As indicated in discovery produced on  
28      February 10, 2020, Victim 5 has described the data as log files and  
customer information including customer names, phone numbers, email  
address, and applications used. *See* USA-00004691. The data also  
included encrypted usernames and passwords. *See id.*

- Victim 6 – the data downloaded from this victim is contained in the following folder on the defendant’s computer:

(volume md126):/aws\_dumps/[REDACTED].tar.xz

An image of this folder was included on a hard drive produced to the defense on January 14, 2022. As indicated in discovery produced on December 22, 2020, Victim 6 has described this information as metadata, including access logs, firewall logs, and error logs that contained customer phone numbers, emails addresses, IP addresses, and domain names. *See* USA-00012460-70; USA-00013377:

- Victim 7 – the data downloaded from this victim is contained in the following folder on the defendant’s computer:

(volume md126):/aws\_dumps/[REDACTED].tar.xz

An image of this folder was included on a hard drive produced to the defense on January 14, 2022. As indicated in discovery produced on February 10, 2020, Victim 7 has described this information as customer database files that included 2.5 million names, phone numbers, addresses, and email addresses, as well as logging data and Linux installers. *See* USA-00004678-89.

- Victim 8 – the data downloaded from this victim is contained in the following folders on the defendant’s computer:

(volume md126):/aws\_dumps/[REDACTED].tar.xz

An image of this folder was included on a hard drive produced to the defense on January 14, 2022. Victim 8 has described this information as metadata describing Victim 8’s AWS instances.

### **Victims of Cryptojacking and/or Attempted Cryptojacking**

The two victims whose servers were used for cryptojacking, or attempted cryptojacking, among the victims identified by number in the Second Superseding Indictment (both of which previously have been identified by name to the defense) were

- Victim 7 – Thompson created new virtual servers on Victim 7’s account that resulted in Victim 7 being billed more than \$50,000 by Amazon

1 Web Services, more than \$45,000 of which that Amazon Web Services  
2 later credited back to Victim 7.

- 3 ■ Victim 8 – Computer scripts recovered from Thompson’s computer  
4 show that Thompson attempted to plant cryptocurrency-mining software  
5 on servers opened on Victim 8’s account.

6 In addition to the victims identified by number in the Second Superseding  
7 Indictment, the Second Superseding Indictment alleges Thompson downloaded data from  
8 a total of more than 30 entities. *See* Second Superseding Indictment ¶ 20. It also alleges  
9 that Thompson used other victims’ servers to perform cryptocurrency mining. *See id.*  
10 ¶ 31 (alleging that Thompson performed, or attempted to perform, cryptocurrency mining  
11 on “computers rented and contracted by Victim 7, Victim 8, and other victims, from  
12 [Amazon Web Services]”).

13 The Court’s Order interprets the Second Superseding Indictment as “implicitly  
14 limit[ing] the crypto mining victims to the pool of eight identified victims.” *See* Order, at  
15 12. As a result, the government has provided defense counsel a letter that identifies  
16 additional data theft and cryptojacking victims, beyond the eight numbered victims in the  
17 indictment, and notes that the government intends to introduce evidence concerning these  
18 victims and that such evidence is admissible, both because it is inextricably intertwined

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1 with the charged conduct, and pursuant to Federal Rule of Evidence 404(b). (A copy of  
2 that letter is attached as Exhibit 1.)  
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4 DATED: March 11, 2022.

5 Respectfully submitted,

6 NICHOLAS W. BROWN  
7 United States Attorney

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